

Magistrate Judge Brian A. Tsuchida

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

MICHAEL JANISCH,
Defendant.

CASE NO. MJ24-699

COMPLAINT for VIOLATION

21 U.S.C. Sections 841(a)(1) and (b)(1)(B)
18 U.S.C. Section 924(c)(1)(A)(i)
(Felony)

BEFORE BRIAN A. TSUCHIDA, United States Magistrate Judge, U. S.
Courthouse, Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT 1

(Possession of a Controlled Substance with Intent to Distribute)

On or about October 30, 2024, in King County, within the Western District of
Washington, Michael JANISCH, did knowingly and intentionally possess, with the intent
to distribute, a controlled substance, including: cocaine, a controlled substance under
Title 21, United States Code.

1 It is further alleged that this offense involved 500 grams or more of cocaine, its
2 salts, optical and geometric isomers, and salts of isomers.

3 All in violation of Title 21, United States Code, Sections 841(a)(1) and
4 841(b)(1)(B).

5 COUNT 2

6 **(Possession of a Firearm in Furtherance of a Drug Trafficking Crime)**

7 On or about October 30, 2024, in King County, within the Western District of
8 Washington, Michael JANISCH, knowingly possessed a firearm, that is: a Mossberg 590
9 shotgun, in furtherance of a drug trafficking crime for which the defendant may be
10 prosecuted in a court of the United States: *Possession of a Controlled Substance with*
11 *Intent to Distribute*, as alleged in Count 1 above.

12 All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

13
14 And the complainant states that this Complaint is based on the following information:

15 I, Jonas Restad, being first duly sworn on oath, depose and say:

16 **AFFIANT BACKGROUND AND QUALIFICATIONS**

17 1. I am a “law enforcement officer of the United States” within the meaning of
18 Title 18, United States Code, Section 2510(7). Specifically, I am a Special Agent (SA)
19 with Homeland Security Investigations (“HSI”) within the United States Department of
20 Homeland Security (DHS). As a Special Agent, I investigate violations of the Controlled
21 Substance Act, Title 21, United States Code, Section 801, et seq., and other violations of
22 federal law, to include violations of Title 18, United States Code, Sections 922 and 924. I
23 have been a Special Agent with HSI since April 2021. I was trained to conduct
24 investigations relating to violations of federal law including the manufacturing and
25 trafficking of controlled substances and money laundering through the Criminal
26 Investigator Training Program and the Homeland Security Investigations Special Agent
27 Training Program at the Federal Law Enforcement Training Center in Glynco, Georgia.

1 My training and experience in narcotics enforcement has included the identification of
2 narcotics, including fentanyl, cocaine, methamphetamine, heroin, opium, MDMA, and
3 marijuana, and the investigation of persons in possession of narcotics for purposes of
4 sales and transportation, as well as persons conspiring to transport and sell narcotics.

5 2. As a federal law enforcement officer, I have received formal training, as
6 well as on-the-job training, in the investigation of narcotics trafficking. I have
7 participated in investigations involving controlled substances, money laundering, and
8 other criminal activity. I am familiar with how drug traffickers use, sell, conceal, and
9 transport, controlled substances. I have been involved in drafting and executing a number
10 of search warrants, conducting controlled narcotics buy operations, and arresting those
11 involved in controlled substances trafficking. I also speak regularly with narcotics
12 investigators at the federal, state, and local level, sellers of narcotics, and informants
13 regarding the manner in which sellers of narcotics store, sell, transport, and communicate
14 about narcotics.

15 3. I am also familiar with the methods employed by narcotics traffickers to
16 conceal their trafficking activity, and the origin of proceeds generated by this activity. I
17 am aware that traffickers use slang and coded words, multiple cell phones, concealed
18 compartments, “stash” houses to conceal their activities, and launder or otherwise
19 conceal cash proceeds by hiding and transporting bulk cash, sending funds through wire
20 transfers or bank accounts in other persons’ names, and/or investing in assets placed in
21 other persons’ names.

22 4. I know that persons who illegally possess and distribute controlled
23 substances often possess firearms and ammunition to protect themselves, their drugs, and
24 their drug proceeds, which are often kept as large quantities of cash. I also know that drug
25 dealers will often need and use firearms to help them intimidate potential rivals and to aid
26 in the collection of drug debts. Therefore, I know that firearms and ammunition, knives
27

1 and other weapons are often found at the location of narcotic search warrants, referred to
2 in communications, and on persons involved in drug dealing and trafficking.

3 5. I know from my training and experience drug dealers often use their
4 vehicles to conduct and facilitate their drug distribution activities. Drug dealers
5 commonly store drugs and drug proceeds at their residences or stash houses and then
6 transport them to/away from their residences or the stash houses in their vehicles. Drug
7 dealers also commonly use their vehicles to transport drugs and drug proceeds between
8 stash houses and their customers. Additionally, drug dealers sometimes store drugs and
9 drug proceeds in their vehicles so that law enforcement officers searching their residences
10 do not discover them.

11 6. This application is based on information I have gained from my own
12 investigation, personal observations, training, and experience, as well as information
13 related to me by other detectives, police officers, and/or federal agents through oral and
14 written reports. In addition, I have reviewed and am familiar with the investigative file in
15 this matter.

16 **INVESTIGATION AND PROBABLE CAUSE**

17 7. This investigation arose from a drug trafficking investigation conducted out
18 of the Western District of Pennsylvania (WDPA). As a result of that earlier investigation,
19 29 defendants were charged on December 20, 2022, in the WDPA for violation of Title
20 21, United States Code, Section 846, Conspiracy to Distribute Controlled Substances
21 (including cocaine, fentanyl, and methamphetamine), and other federal offenses. *See*
22 WDPA Case No. CR22-021. The WDPA conspiracy spanned several states, including
23 Pennsylvania, Arizona, and Washington.

24 8. One of the leaders of the Washington arm of the conspiracy was Bryce Hill
25 (hereafter, "HILL"). Intercepted communications from December 1, 2022, to January 11,
26 2023, over HILL's cell phone, (702) 354-8467 (hereafter, "TT39"), revealed HILL was a
27 prolific narcotics distributor in the Western District of Washington (WDWA). Based on

1 evidence gathered in the investigation, agents estimate HILL was receiving and
2 redistributing approximately one million fentanyl pills every seven to ten days. The
3 investigation revealed that HILL also redistributed a significant quantity of cocaine and
4 methamphetamine. HILL was typically resupplied by couriers who flew the controlled
5 substances, which were concealed in their checked luggage, from Phoenix to Seattle.
6 HILL was charged in the WDPa case and arrested in Seattle on January 11, 2023.

7 9. The subsequent investigation has revealed that HILL was working with
8 Amir OSMAN and Michael JANISCH to distribute drugs in this District.

9 10. On May 8, 2024, in WDWA Cause No. GJ24-321, the Honorable U.S.
10 District Court Judge John H. Chun authorized the interception of electronic
11 communications over Amir OSMAN's Snapchat account with username "twoprezz"
12 (Target Account 14, or "TA14").¹ Investigators began intercepting electronic
13 communications occurring over this account beginning that same day, on May 8, 2024.
14 Pursuant to the terms of the order, interception over TA14 ended on June 6, 2024.

15 *June 24, 2024: OSMAN is Shot and Killed in Seattle's University District*

16 11. On June 24, 2024, OSMAN was shot and killed in the University District
17 neighborhood of Seattle, Washington. More specifically, OSMAN was found in the street
18 near a drug-involved premises located at NE 42nd Street and Pasadena Place NE.²
19 OSMAN had been shot through the upper chest. Seattle Police Department detectives are
20

21 ¹ Investigators identified three Snapchat accounts for OSMAN (with the usernames "leemoney206"/"amirlethal,"
22 "prezzi2x," and "twoprezz"). "Amirlethal" is a legacy username for "leemoney206." A legacy username is a
23 previous username associated with the identified account. Investigators obtained search warrants for information and
24 records, including content, for all three of these accounts for certain identified periods. A review of the information
25 returned for all three accounts confirmed for investigators that they were used by OSMAN. For example, the content
26 from these accounts included many "selfie"-style videos that had been sent from the accounts. The individual
27 depicted in these "selfie" videos appeared to be OSMAN, based on a comparison with his driver's license photo.

25 ² Individuals that have been operating the drug-involved premises immediately adjacent to where OSMAN was shot
26 and killed have recently been charged in a fifteen-count indictment with, *inter alia*, Conspiracy to Distribute
27 Controlled Substances in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), (b)(1)(C), and 846
(in WDWA Cause No. CR24-186-JHC).

1 investigating his homicide. Details regarding OSMAN's murder are still developing.

2 12. On June 26, 2024, in WDWA Cause No. GJ24-425, the Honorable U.S.
3 District Court Judge John H. Chun authorized the interception of wire and electronic
4 communications over (206) 751-9426 (hereafter, "TT30"). Investigators began
5 intercepting wire and electronic communications occurring over this account beginning
6 that same day, on June 26, 2024. Pursuant to the terms of the order, interception over
7 TT30 ended on July 25, 2024.

8 13. On August 12, 2024, in WDWA Cause No. GJ24-524, the Honorable U.S.
9 District Court Judge John H. Chun authorized the interception of wire and electronic
10 communications over (206) 683-2980 (hereafter, "TT35"), (929) 371-1019 (hereafter,
11 "TT37"), and (206) 255-0855 (hereafter, "TT45"). Investigators began intercepting wire
12 and electronic communications occurring over these telephones beginning that same day,
13 on August 12, 2024. Pursuant to the terms of the order, interception over TT35, TT37,
14 and TT45 ended on September 10, 2024.³

15 JANISCH is Identified to be a Drug Trafficking Associate of both HILL and
16 OSMAN

17 14. In communications extracted from HILL's phone (TT39) (pursuant to a
18 warrant obtained in WDWA Cause No. MJ23-007), investigators identified Snapchat
19 communications between HILL (from an account with username "bmoneydadon42") and
20 an account with username "nbaseattle1." Investigators subsequently identified that
21 JANISCH was the user of the "nbaseattle1" account.⁴

22 _____
23 ³ During interception over TA14, TT30, TT35, TT37, and TT45, investigators did not intercept the number they had
24 identified JANISCH to be using. Investigators do not know if JANISCH had additional numbers he was using during
this time.

25 ⁴ Records obtained from Snap Inc. for the account "nbaseattle1" (obtained pursuant to a warrant in WDWA Cause
26 No. MJ24-155), reflect that the display name for that account is "Zac Wit Da Pac." On March 13, 2023, the user of
27 the "nbaseattle1" account sent another user the Cash App account with username "\$NBASeattle" and the display name
"Zac T." When reviewing that Cash App account, investigators noticed a similar Cash App account with username

15. Specifically, on January 10, 2023 it appeared JANISCH (“nbaseattle1”) asked HILL (“bmoneydadon42”) about firearm “switches”:

NBASEATTLE1
Aye you still got them siwtches in the jeep ya?

✓ Received
1/10/2023 6:33:14 AM

BMONEYDADON42
Yesiiiiir

✓ Sent
1/10/2023 6:33:21 AM

NBASEATTLE1
Yuppp I be forgetting what all is in there lmaooo

✓ Received
1/10/2023 6:34:04 AM

NBASEATTLE1
Need one of them thangs 🗑️👉👈

✓ Received
1/10/2023 6:34:23 AM

BMONEYDADON42
Got u brotha 🤔

✓ Sent
1/10/2023 6:34:37 AM

16. Based on training and experience, investigators know that a “switch” often means a “Glock switch,” which is a firearm component – machinegun conversion devices (MCDs) – that converts a semi-automatic pistol into a machinegun capable of fully automatic fire. Through the broader investigation, investigators know that members of this drug trafficking organization (DTO) have used MCDs on their firearms. For example, when HILL was arrested on January 11, 2023, investigators found a Glock pistol, modified with a “switch” as well as an extended magazine, under the driver’s seat of his vehicle (a black 2016 Mercedes). Additionally, on May 22, 2024, investigators searched the residence of another DTO member, Cooper SHERMAN, in the Ballard

“nbaseattle312” and display name “Michael Janisch.” Investigators then reviewed JANISCH’s driver’s license photo and noted that the photograph appeared to be of the same individual depicted in the content in the “nbaseattle1” Snapchat account.

neighborhood of Seattle and found a Glock pistol modified with a “switch,” with an extended magazine inserted.

17. The above Snapchat conversation between HILL and JANISCH continued, and it appeared they were discussing how much money they were making, presumably from narcotics sales:

| | |
|---|---|
| <p>BMONEYDADON42</p> <p>Got u brotha 🤔</p> | <p>➤ Sent</p> <p>1/10/2023 6:34:37 AM</p> |
| <p>BMONEYDADON42</p> <p>Nigga at this point I damn near forgot bout it 🤔🤔🤔🤔</p> | <p>➤ Sent</p> <p>1/10/2023 6:34:47 AM</p> |
| <p>NBASEATTLE1</p> <p>Nigga finna be up a million by the time that shit hit</p> | <p>✓ Received</p> <p>1/10/2023 6:48:29 AM</p> |
| <p>BMONEYDADON42</p> <p>No cap 🤔🤔 I'm on route to hit it before my bday in march</p> | <p>➤ Sent</p> <p>1/10/2023 6:52:01 AM</p> |
| <p>NBASEATTLE1</p> <p>I just hit a quarter like a month back, tryna hit half a m by the end of this year 🤔🤔🤔</p> | <p>✓ Received</p> <p>1/10/2023 6:53:04 AM</p> |
| <p>BMONEYDADON42</p> <p>🤔🤔🤔 u got it brother</p> | <p>➤ Sent</p> <p>1/10/2023 6:54:08 AM</p> |
| <p>NBASEATTLE1</p> <p>This the winning team fr</p> | <p>✓ Received</p> <p>1/10/2023 6:55:45 AM</p> |
| <p>NBASEATTLE1</p> <p>Man my nigga out in Minnesota who was tryna grab the fatty</p> | <p>✓ Received</p> <p>1/10/2023 6:55:55 AM</p> |

18. Here, HILL and JANISCH appear to have been discussing how much money they would like to acquire in a certain timeframe. For example, JANISCH stated

1 “... finna be up a million... [,]” to which HILL replied, “[n]o cap [emoji] I’m on route to
 2 hit it before my bday in march.” When JANISCH stated “[t]his the winning team fr [for
 3 real],” investigators believe that JANISCH was suggesting the sale of narcotics is
 4 lucrative as he then mentioned “fetty,” which investigators know is a common slang
 5 abbreviation for “fentanyl.” Investigators seized approximately 26.7 kilograms of
 6 fentanyl pills, approximately \$387,559 in U.S. currency, and multiple firearms from
 7 HILL’s residence at the time of his arrest on January 11, 2023 – one day after this
 8 exchange between JANISCH and HILL.

9 19. Also via Snapchat, on or about September 27, 2023, JANISCH
 10 (“nbaseattle1”) also sent OSMAN (at the account with username “prezzi2x”) the
 11 following images:



21 20. Based on training and experience, investigators believe these images depict
 22 MDMA.

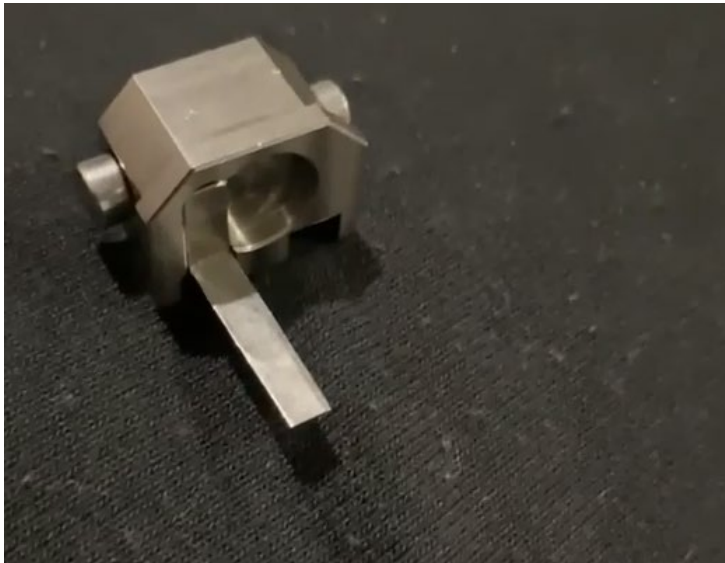
23 ///

24 ///

Messages in JANISCH's Snapchat Account Reflect he Possessed and Used
Firearms Switches

21. Based upon the communications detailed above, investigators obtained a search warrant for JANISCH's "nbaseattle1" account (in WDWA MJ24-155).⁵

22. On March 18, 2023, JANISCH ("nbaseattle1") sent Snapchat user "austin305jit" a message with a video attached. The video depicts what appears to be a "Glock switch," or MCD. As described above, investigators know, based on training and experience, that a "Glock switch," or MCD, is a firearm component that converts a semi-automatic pistol into a machinegun—i.e., a pistol capable of fully automatic fire. The following is a screenshot from that video:



23. On March 18, 2023, JANISCH ("nbaseattle1") sent another video to the Snapchat user "svtcontour". The video depicts the videographer shooting a pistol that

⁵ Records obtained from Snap Inc. reflect that JANISCH's Snapchat account "nbaseattle1" was active until approximately October 27, 2023. On January 29, 2024, investigators searched for "nbaseattle1" using an undercover Snapchat account and could not find it. Investigators believe, therefore, that the account was deleted at some point between October 27, 2023 and January 29, 2024. Though investigators have attempted to identify a new Snapchat account for JANISCH, such efforts have been unsuccessful to date. More generally, investigators know that Snapchat has been attempting to prevent illegal activities on its platform and has been banning users and deleting accounts that post images of narcotics and firearms. Investigators do not know, however, whether this explains why they have not found another account for JANISCH.

1 fires fully automatically. It appears to be equipped with an MCD, similar to the one
 2 depicted in the video above. The following is a screenshot from the video:



11 24. In WDWA Cause No. MJ24-691, investigators obtained a warrant to search
 12 JANSICH's residence, located at 2849 60th Ave SE, Mercer Island, WA 98040, for
 13 evidence of drug trafficking, associated firearms offenses, and money laundering.

14 25. Investigators executed the warrant at JANISCH's residence on October 30,
 15 2024. During the search of JANISCH's residence, investigators discovered a large safe
 16 located in what they determined to be JANISCH's bedroom. In the safe, investigators
 17 recovered, among other things:

- 18 a. approximately 3.6 kilograms of cocaine;⁶
- 19 b. approximately 643.2 grams of ketamine;
- 20 c. approximately 766.1 grams of MDMA;
- 21 d. approximately 64.44 grams of LSD;
- 22 e. approximately 20 firearms, including one that was modified with an MCD,⁷

24
 25 ⁶ I have been informed by investigators that the identified controlled substances were field tested and tested positive for the identified substances.

26 ⁷ An Alcohol Tobacco and Firearms (ATF) firearms expert who was present for a portion of the search of
 27 JANISCH's residence has examined this firearm. This ATF firearms expert has informed me that the firearm was

1 f. an undetermined amount of bulk cash;⁸ and

2 g. and a U.S. passport in JANISCH's name.

3 26. Next to the bed in JANISCH's bedroom, where the safe was located,
4 investigators found a loaded Mossberg 590 shotgun.

5 27. Investigators also found a number of other firearms in the residence. In
6 total (to include the Mossberg shotgun and firearms found in the safe), investigators
7 estimate there were approximately 30 firearms found in the residence.⁹

8 28. In addition to the controlled substances identified above, investigators also
9 recovered approximately 31.24 kilograms of suspected psilocybin mushrooms.

10 **CONCLUSION**

11 29. Based on the above facts, I respectfully submit that there is probable cause
12 to believe that JANISCH did knowingly and intentionally possess, with the intent to
13 distribute, cocaine, a controlled substance, in violation of 21, United States Code, Section
14 841(a)(1). Based on the weight of the cocaine – 3.6 kg or 3600 grams – I further submit
15 there is probable cause to believe the offense involved 500 grams or more of cocaine, its
16 salts, optical and geometric isomers, and salts of isomers, in violation of Title 21, United
17 States Code, Section 841(b)(1)(B). Finally, I respectfully submit there is probable cause

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21 _____
22 a) not loaded with ammunition, b) was found within the safe in JANISCH's bedroom, and c) was fully functional
23 with an MCD – i.e., it was operable as a machinegun.

24 ⁸ Investigators estimate this to be tens of thousands of US currency but have not yet obtained an official count.


25 ⁹ Due to the large volume of evidence found at JANISCH's residence, investigators are still processing it.

1 to believe that JANISCH knowingly possessed a firearm (the loaded Mossberg shotgun)
2 in furtherance of a drug trafficking crime for which the defendant may be prosecuted in a
3 court of the United States, in violation of Title 18, United States Code, Section
4 924(c)(1)(A)(i).

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7 
8 Jonas Restad, Complainant
9 Special Agent, Homeland Security
10 Investigations

11 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
12 presence, the Court hereby finds that there is probable cause to believe the Defendant
13 committed the offense set forth in the Complaint.

14 Dated this 31st day of October, 2024.

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16 
17 BRIAN A. TSUCHIDA
18 United States Magistrate Judge
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